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ATTORNEYS FOR DEFENDANT  
HYUNDAI MOTOR FINANCE COMPANY

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA

IN RE:	)	Case No. 06-60855
	)	
INCREDIBLE AUTO SALES, LLC,	)	Adversary No. 06-00120
	)	
Debtor.	)	
_____	)	
	)	
MANHEIM SERVICES CORPORATION	)	
dba SOUTH SEATTLE AUTO	)	
AUCTION,	)	
	)	<b>ANSWER OF HYUNDAI MOTOR</b>
Plaintiff,	)	<b>FINANCE COMPANY</b>
	)	
v.	)	
	)	
INCREDIBLE AUTO SALES, LLC, and	)	
HYUNDAI MOTOR FINANCE	)	
COMPANY,	)	
	)	
Defendants.	)	

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Defendant Hyundai Motor Finance Company ("HMFC") submits the following  
Answer to Plaintiff's Complaint.

**FIRST DEFENSE**

With respect to the individually numbered paragraphs of Plaintiff's Complaint, HMFC responds as follows:

1. HMFC admits the allegations of paragraph 1 of Plaintiff's Complaint.
2. HMFC admits the allegations of paragraph 2 of Plaintiff's Complaint.
3. HMFC admits the allegations of paragraph 3 of Plaintiff's Complaint.
4. HMFC lacks sufficient information to admit or deny the allegations of paragraph 4 of Plaintiff's Complaint and therefore denies the same.
5. HMFC admits the allegations of paragraph 5 of Plaintiff's Complaint.
6. HMFC admits the allegations of paragraph 6 of Plaintiff's Complaint.
7. In response to paragraph 7 of Plaintiff's Complaint, Defendant HMFC incorporates all preceding responses as though set forth fully herein.
8. On information and belief, HMFC admits the allegation of paragraph 8 of Plaintiff's Complaint.
9. On information and belief, HMFC admits the allegation of paragraph 9 of Plaintiff's Complaint.
10. On information and belief, HMFC admits the allegation of paragraph 10 of Plaintiff's Complaint.
11. HMFC lacks sufficient information to admit or deny the allegations of paragraph 11 of Plaintiff's Complaint and therefore denies the same.
12. HMFC lacks sufficient information to admit or deny the allegations of paragraph 12 of Plaintiff's Complaint and therefore denies the same.

**COUNT I**

13. In response to paragraph 13 of Plaintiff's Complaint, Defendant HMFC incorporates all preceding responses as though set forth fully herein.

14. HMFC lacks sufficient information to admit or deny the allegations of paragraph 14 of Plaintiff's Complaint and therefore denies the same.

15. HMFC lacks sufficient information to admit or deny the allegations of paragraph 15 of Plaintiff's Complaint and therefore denies the same.

16. HMFC denies the allegations of paragraph 16 of Plaintiff's Complaint.

17. HMFC denies the allegations of paragraph 17 of Plaintiff's Complaint.

**COUNT II**

18. In response to paragraph 18 of Plaintiff's Complaint, Defendant HMFC incorporates all preceding responses as though set forth fully herein.

19. HMFC denies the allegations of paragraph 19 of Plaintiff's Complaint.

20. HMFC denies the allegations of paragraph 20 of Plaintiff's Complaint.

21. HMFC denies the allegations of paragraph 21 of Plaintiff's Complaint.

**SECOND DEFENSE**

HMFC holds a properly perfected security interest in some or all of the vehicles for which reclamation is sought. Plaintiff is not entitled to reclaim those vehicles because doing so would impair HMFC's security interest. See 11 U.S.C. § 546(c).

WHEREFORE HMFC prays as follows:

1. That Plaintiff take nothing by its Complaint;

2. That the Court enter an Order declaring that HMFC holds a valid security interest in the subject vehicles and that Plaintiff's reclamation rights, if any, are subject to HMFC's security interest;

2. That HMFC be awarded its costs incurred in defending this action; and

3. That the Court award HMFC such other and further relief that the Court deems proper.

Dated this 15th day of November, 2006.

/s/ Shane P. Coleman

Shane P. Coleman, #3417

Holland & Hart LLP

401 North 31st Street

Suite 1500

P.O. Box 639

Billings, MT 59103-0639

ATTORNEYS FOR DEFENDANT HYUNDAI  
MOTOR FINANCE COMPANY

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of November, 2006, I served a true and correct copy of the foregoing, addressed as follows and by the method shown below:

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/s/ Shane P. Coleman